

IN THE CIRCUIT COURT OF ST. LOUIS CITY, MISSOURI**DANIELLE MITCHELL**3307 S Jefferson Street
St. Louis, Missouri 63118

Plaintiff,

v.

**MARRIOTT INTERNATIONAL,
INC. dba ST. LOUIS MARRIOTT
GRAND HOTEL****Please serve registered agent:**Corporate Creations Network, Inc.
12747 Olive Boulevard, #300
St. Louis, Missouri 63141

and

DENISE SHELL1672 B Northwinds Estate Drive
St. Louis, Missouri 63136

and

VERA SOSTRE616N. 7th Street, Apartment 909
St. Louis, Missouri 63101

and

REBECCA CRIST800 Washington Ave.
St. Louis, Missouri 63101

and

MELISSA MAZZA800 Washington Avenue.
St. Louis, Missouri 63101

Case No.:

Division

**JURY TRIAL
DEMANDED****Exhibit A**

and)
)
DEVON JARRELL)
 4104 Arsenal Street, 1F)
 St. Louis, Missouri 63116)
)
 and)
)
NOUREDDINE LAASRI)
 9364 Pine Avenue)
 St. Louis, Missouri 63144)
)
 Defendants.)

PETITION FOR DAMAGES

COMES NOW, Plaintiff Danielle Mitchell (hereinafter “Mitchell”), by and through undersigned counsel, and for this cause of action against Marriott International Inc., dba Marriott St. Louis Marriott Grand Hotel (hereinafter “Marriott Grand Hotel”), and against Denise Shell, hereinafter referred to as “Defendant Shell,” and against Vera Sostre, hereinafter referred to as “Defendant Sostre”, and against Rebecca Crist, hereinafter referred to as “Defendant Crist”, and against Melissa Mazza, hereinafter referred to as “Defendant Mazza”, and against Devon Jarrell, hereinafter referred to as “Defendant Jarrell”, and against Nouredine Laasri, hereinafter referred to as “Defendant Laasri”, states and alleges as follows:

PARTIES AND AGENTS

1. Mitchell is now, and at all times relevant herein, a resident of 3307 S. Jefferson Street, Saint Louis, Missouri 63118.

2. At all relevant times herein, Mitchell was an employee of Marriott Grand Hotel at the Starbucks Coffee Shop, hereinafter referred to as "Starbucks" at its 800 Washington Street, St. Louis, Missouri 63101 location where she had worked.

3. At all relevant times herein, Mitchell acted within the course and scope of her employment with Marriott Grand Hotel.

4. Marriott Grand Hotel is a Missouri Corporation and is registered to conduct business at 800 Washington Street, St. Louis, Missouri 63101.

5. Marriott Grand Hotel is an employer within the meaning of R.S.Mo §213.111.

6. At all times relevant herein, Defendant Shell was an employee of Marriott Grand Hotel, and was engaged in the capacity as Lead Barista for Starbucks at the St. Louis Marriott Grand Hotel location.

7. At all relevant times herein, Defendant Shell acted within the course and scope of her employment with Marriott Grand Hotel and as Lead Barista and Manager of Plaintiff.

8. At all times relevant herein, Defendant Sostre was an employee of Marriott Grand Hotel and was engaged in that capacity for the St. Louis Marriott Grand Hotel.

9. At all relevant times herein, Defendant Sostre acted within the course and scope of her employment with Marriott Grand Hotel as Hotel Director of Operations.

10. At all times relevant herein, Defendant Crist was an employee of Marriott Grand Hotel and was engaged in the capacity of Director of Human Resources Operations for the St. Louis Marriott Grand Hotel.

11. At all relevant times herein, Defendant Crist acted within the course and scope of her employment with Marriott Grand Hotel as Director of Human Resources Operations.

12. At all times relevant herein, Defendant Mazza was an employee of Marriott Grand Hotel and was engaged in that capacity for the Marriott Grand Hotel.

13. At all relevant times herein, Mazza acted within the course and scope of her employment with Marriott Grand Hotel as Director of Human Resources.

14. At all times relevant herein, Defendant Jarrell was an employee of Marriott Grand Hotel and was engaged in the capacity of Senior Food and Beverage Operations Manager for the Marriott Grand Hotel.

15. At all relevant times herein, Jarrell acted within the course and scope of his employment with Marriott Grand Hotel as Senior Food and Beverage Operations Manager.

16. At all times relevant herein, Defendant Laasri was an employee of Marriott Grand Hotel and was engaged in that capacity for the Marriott Grand Hotel.

17. At all relevant times herein, Laasri acted within the course and scope of his employment with Marriott Grand Hotel as General Manager.

18. Marriott Grand Hotel employed more than 6 employees and therefore is an employer within the meaning of R.S.Mo. §213.010 (7).

19. Marriott Grand Hotel is an employer whose address is located within this judicial venue.

20. Plaintiff Mitchell is a 29 year-old, African American female who was employed by Defendant Marriott Grand Hotel, and therefore Plaintiff is a member of the protected class under R.S.Mo. §213.111.

JURISDICTION AND VENUE

21. Mitchell alleges she was subjected to racial and color discrimination, disability discrimination and harassment, and retaliation by Marriott Grand Hotel, Denise Shell, Vera Sostre, Rebecca Crist, Melissa Mazza, Devon Jarrell, and Nouredine Laasri (collectively “Defendants”), on August 10, 2015.

22. On January 12, 2016, Mitchell filed a Charge of Discrimination with the Missouri Commission on Human Rights (hereinafter MCHR). On April 4, 2016, Mitchell filed a First Amended Charge on Discrimination.

23. Mitchell’s MCHR charge was brought within 180 days of the last alleged act of discrimination as required under Mo. Rev. Stat. § 213.111(1).

24. The MCHR issued Plaintiff a Notice of Right to Sue on January 31, 2017, allowing Plaintiff to proceed to file this action in court. A copy of Plaintiff’s First Amended Charge of Discrimination, Exhibit 1, and a copy of the MCHR Notice of Right to Sue, Exhibit 2, are attached hereto and are fully incorporated by reference as though fully set forth herein.

25. Plaintiff brings this cause of action within 90 days of the date of the Notice of Right to Sue and has met all of the requirements of Mo. Rev. Stat. § 213.111(1) by exhausting all administrative remedies required under the Missouri Human Rights Act.

26. This Court has personal jurisdiction over Defendants because Defendants are domiciled in Missouri, engaged in business in Missouri, and because Plaintiff alleges that Defendants committed tortious conduct in Missouri.

27. Venue is proper in City of St. Louis, Missouri, because Plaintiff alleges she was discriminatorily suspended by Marriott Grand Hotel in St. Louis, Missouri, and pursuant to Mo. Rev. Stat. § 213.111 (1), “action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred.”

28. The due process requirements of minimum contacts and notice and opportunity to be heard are satisfied in that: 1) Defendants have purposely availed themselves of the privilege of conducting activities within the State of Missouri and enjoy the benefits and protections of laws of the State of Missouri; and 2) the means employed to give notice to Defendants are reasonably intended to inform Defendants of the suit.

FACTS COMMON TO ALL COUNTS

29. Plaintiff incorporates paragraphs 1 through 28 herein as though fully set forth and re-alleged.

30. Danielle Mitchell began her employment with Marriott Grand Hotel in the Starbucks Coffee Shop on or around May 15, 2007 as a part-time barista.

31. Mitchell's duties included working the cash register, serving customers, and cleaning the coffee machines. Mitchell enjoyed her job at Starbucks.

32. Mitchell was offered a full-time position and moved into that full-time position at Starbucks in 2013.

33. In April 2013, Mitchell's mother fell ill. As her mother's primary caretaker, Mitchell was forced to take some time off from work in order to provide the needed care for her mother.

34. Mitchell did not have a good understanding of the Family Medical Leave Act (FMLA) at this time, so she spoke to her manager, Paul Armstrong, in preparation for caring for her mother and before taking a few months of leave.

35. Armstrong told Mitchell to call when she was ready to come back to work, and he said that he would put Mitchell back on the schedule. Mitchell returned to work in June 2013, and encountered no issues.

36. In December 2013, Mitchell's mother's illness worsened, and once again, she was forced to take a second round of leave.

37. This time, a nurse who worked in the building, Marianne, told Mitchell about the Family Medical Leave Act (FMLA).

38. Mitchell spoke to Human Resources, filled out the required FMLA paperwork, and left to take care for her mother.

39. Once again, Mitchell was assured that her job would be waiting for her upon her return.

40. Mitchell's leave started on December 4, 2013. Her mother's illness and disability required a constant caretaker so she applied to extend her FMLA leave on January 9, 2014.

41. Mitchell came back to work at Marriott Grand Hotel in the Starbucks Coffee Shop on a full-time basis in June of 2014.

42. Before Mitchell's leave, she did not have any work related issues and regularly received good performance reviews. She was awarded with a full-time position because of good work performance in 2013.

43. It was upon Mitchell's return to work in June of 2014, that Marriott Grand Hotel Management started to harass and retaliate against Mitchell for having taken family leave.

44. The retaliation began by Starbucks' managers over-scheduling her, which meant that she would be the first one sent home if the store was not busy that day.

45. Mitchell began to suffer financially since she was an hourly worker. She lost income every time she was sent home early.

46. In addition, Mitchell's regularly scheduled days (days that she couldn't be sent home even if the store was not busy) were drastically cut back.

47. Mitchell went from having five regularly scheduled work days per week down to two or three regularly scheduled work days.

48. Mitchell spoke to all of her managers (Denise Shell, Devin Jarrell, LaShawna Harper, and Vera Sostre) about her mother's disability, her FMLA leave, and coordinating her work schedule.

49. Mitchell had given Starbucks' managers ample notice regarding her taking FMLA leave time and had gone through all proper channels to make sure everyone was on the same page.

50. However, Mitchell's efforts to maintain a working relationship with her managers failed, and they continued to retaliate against her for taking leave.

51. Mitchell's managers, specifically Defendant Shell and Defendant Sostre, started a campaign of intimidating and harassing Mitchell about her absences, and consequently this affected Mitchell's relationship with the other managers to whom she reported and other employees.

52. Mitchell was called a "**faker**" behind her back and to her face. One manager called her a **liar** and asked "**Is your mom going to be sick again tomorrow?**" when Mitchell would leave for home at the end of her shift.

53. Dealing with her mother's illness was incredibly emotional and stressful for Mitchell. It was especially hurtful to hear her managers making fun of it.

54. Mitchell felt as though the Marriott Grand Hotel and Starbucks managers went out of their way to make humiliating and uncaring remarks about her mom's illness and made an effort to shame Mitchell for having used her lawful disability leave.

55. The harassment continued and Mitchell was so emotionally spent that she considered quitting a job that she had formerly loved and where she had worked for over eight years. However, Mitchell needed this employment. She endured the humiliation because she needed the income in order to take care of her mother and children.

56. Mitchell's managers continued to single her out at work in retaliation for using family leave time.

57. Baristas of Starbucks shared the responsibility of getting items from "the cage", the supply closet. When Mitchell returned from her disability leave, she was suddenly the only one sent back to "the cage" to refill items in the kitchen.

58. Mitchell was now harassed for taking a break to use the bathroom, even though she had never encountered this treatment before taking the leave time.

59. In the Fall of 2014, Mitchell spoke to HR about the treatment and harassment she was receiving from managers.

60. In retaliation, Mitchell was written up/disciplined for going to speak to HR about this harassment, even though all employees have a right to report to HR without repercussion.

61. On another occasion, Shawnee, a manager, falsely told Mitchell's lead barista, Defendant Shell, that Mitchell had complained about having to open the cash drawer at the beginning of her shift. This statement was untrue as Mitchell did not say that. Without any evidence or proof and in spite of Mitchell's adamant denial, Defendant Shell chose to believe Shawnee anyway.

62. When Mitchell tried to explain, Defendant Shell yelled at her and called her a **"faker"** and a **"liar."** Mitchell became overwhelmed and started to cry.

63. The next day, Defendant Shell wrote a note on the staff bulletin board saying, **"Please Come in with your banks in at all times leave the CRYING at the door. Come in and put your bank in thank you."**

64. This was a direct and public reference to Mitchell's conversation with Defendant Shell the previous day. To make matters worse, Defendant Shell told Mitchell's co-workers that Mitchell left crying so they all knew Defendant Shell's comments were directed solely at her.

65. Mitchell believes she was being harassed and publically humiliated in an effort to get her to quit Marriott Grand Hotel's Starbucks.

66. In Spring 2015, Mitchell was again falsely accused and written up.

67. Mitchell was accused of abandoning her job. Unforeseen, Mitchell's mother was ill that day and no other caretaker was available for her. Mitchell asked Defendants Shell and Jarrell if she could go home for the day. The managers granted permission for Mitchell to leave. She did not abandon her job.

68. However, the next day, Defendant Shell and Defendant Jarrell informed Mitchell that she had "abandoned her job" and would be written up.

69. Again, Mitchell felt there was a consistent conspiracy among the managers to try and push Mitchell to quit her job.

70. Plaintiff Mitchell felt alone and unsure about what to do. Contacting HR in late 2014 and making HR aware of her harassment had only worsened Mitchell's working conditions and increased the harassment. No corrective action had been forthcoming.

71. On June 18, 2015, Mitchell arrived at work and started cleaning the machines and serving customers.

72. An employee from another business in Mitchell's building ordered a tea. These employees are referred to as "delighters" and as a courtesy were allowed a free drink from Starbucks.

73. Mitchell served the drink, but because the store was busy, Mitchell forgot to ring up the drink as a "delighter."

74. The next day, June 19, 2015, Mitchell was called to the managers' office. She was fired for failing to properly ring up the drink, even though Mitchell's managers and co-workers routinely gave away free drinks without ringing them up, but were never disciplined or written-up for doing so.

75. Mitchell firmly believes that her termination was retaliation for her use of the FMLA leave and that management was singling her out for discipline in an effort to force her resignation. However, Mitchell did not quit as she valued and needed her job, but Marriott Grand Hotel ultimately terminated her.

76. Mitchell further contends that Defendant Marriott Grand Hotel conspired to change the racial component of the Marriott Grand Hotel Starbucks and that Marriott Grand Hotel had a more pernicious motivation for firing Mitchell. Prior to Mitchell's termination, the majority of associates employed at this Starbucks were predominately African American (Black).

77. On information and belief, that Marriott Grand Hotel hoped to rebrand the Starbucks store, and since Mitchell's termination, the store has made a consistent effort to hire more White employees. After Mitchell's departure, Starbucks has gone from a predominately Black staff to a predominately White staff.

78. Mitchell alleges on information and belief that the management at Marriott Grand Hotel had a plan to weed out and fire Black workers who were baristas and replace them with White workers, and Mitchell's race caused her job to be a casualty of a plan to change the racial makeup of Starbucks' baristas.

79. Mitchell contends her race was a *contributing factor* in the decision to fire her.

80. In point of fact, since the time after Mitchell was fired, the demographics of the baristas has changed as more White workers have been hired to replace Black workers.

81. Mitchell also contends that had she been White, Starbucks would have been more tolerant and understanding about her need for FMLA. Mitchell was stereotyped as having an "inferior work ethic" based on her color and need for family leave.

82. In addition, Marriott Grand Hotel Starbucks' management would not have been focused on the need to discipline or write-up Mitchell for every minor infraction. Management was more tolerant with other employees for these similar minor mistakes and lapses.

83. Based on the foregoing, it is apparent that Mitchell had been terminated due to her need for FMLA and in retaliation for having used it, due to her race and color, and due to the efforts of Marriott Grand Hotel to change the racial makeup of its employee base at Starbucks, but **not** due to her work performance.

COUNT I

DISABILITY DISCRIMINATION AGAINST DANIELLE MITCHELL BY DEFENDANT MARRIOTT GRAND HOTEL, DEFENDANT SHELL, DEFENDANT SOSTRE, DEFENDANT CRIST, DEFENDANT MAZZA, DEFENDANT JARRELL, AND DEFENDANT LAASRI.

84. Plaintiff hereby incorporates paragraphs 1 through 83 as though fully set forth herein.

85. Defendants' actions, as detailed above, constituted discrimination in violation of the Missouri Human Rights Act § 213.055.

86. Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri were active in disability discrimination towards Mitchell by contributing to the suspension of her employment due to her use of FLMA.

87. Defendants' actions were unreasonable and disrupted Mitchell well-being.

88. As a result of Defendants' actions, Mitchell now has no financial support to care for her ill mother and daughter.

89. Defendants engaged in actions that created an atmosphere where Mitchell was subject to open discrimination.

90. Defendants knew that these actions were unlawful.

91. Defendants' acts were undertaken maliciously and/or in reckless disregard of Plaintiff's right to be free from discrimination in the workplace.

92. Plaintiff has been damaged by Defendants' unlawful actions.

WHEREFORE, Plaintiff Danielle Mitchell prays that this honorable Court enter judgment in her favor and against Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri for a fair and reasonable amount in excess of twenty-five thousand (\$25,000.00) dollars including the following:

- a. Declare the conduct engaged in by Defendants to be a violation of Plaintiff's rights;

- b. Actual damages including future-pay, front-pay, equitable relief, compensatory damages, including an amount equal to his lost wages and other benefits of employment, with interest;
- c. Award Plaintiff reasonable attorney's fees and costs incurred herein;
- d. Award Plaintiff compensatory and punitive damages;
- e. Award Plaintiff for emotional pain and suffering; and
- f. Grant such other and further legal relief as the Court deems just and proper under the facts and circumstances.

COUNT II
**RACIAL AND COLOR DISCRIMINATION AGAINST DANIELLE MITCHELL
BY DEFENDANT MARRIOTT GRAND HOTEL, DEFENDANT SHELL,
DEFENDANT SOSTRE, DEFENDANT CRIST, DEFENDANT MAZZA,
DEFENDANT JARRELL, AND DEFENDANT LAASRI.**

93. Plaintiff hereby incorporates Paragraphs 1 through 92 as though fully set forth herein.

94. Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri were active in racial and color discrimination towards Mitchell by contributing to the suspension of her employment due to her African American race and their wish to rebrand the store with more white employees.

95. Plaintiff's race (African American) was a *contributing factor* in Defendants' decision to terminate her employment.

96. Defendants' actions were unreasonable and disrupted Mitchell well-being.

97. As a result of Defendants' actions, Mitchell now has no financial support to care for her ill mother and daughter.

98. Defendants engaged in actions that created an atmosphere where Mitchell was subject to open discrimination.

99. Defendants knew that these actions were unlawful.

100. Defendants' acts were undertaken maliciously and/or in reckless disregard of Plaintiff's right to be free from discrimination in the workplace.

101. Plaintiff has been damaged by Defendants' unlawful actions.

WHEREFORE, Plaintiff Danielle Mitchell prays that this honorable Court enter judgment in her favor and against Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri for a fair and reasonable amount in excess of twenty-five thousand (\$25,000.00) dollars including the following:

- a. Declare the conduct engaged in by Defendants to be a violation of Plaintiff's rights;
- b. Actual damages including future-pay, front-pay, equitable relief, compensatory damages, including an amount equal to his lost wages and other benefits of employment, with interest;
- c. Award Plaintiff reasonable attorney's fees and costs incurred herein;
- d. Award Plaintiff compensatory and punitive damages;
- e. Award Plaintiff for emotional pain and suffering; and
- f. Grant such other and further legal relief as the Court deems just and proper

under the facts and circumstances.

COUNT III

**RETALIATION AND HARASSMENT AGAINST DANIELLE MITCHELL BY
DEFENDANT MARRIOTT GRAND HOTEL, DEFENDANT SHELL,
DEFENDANT SOSTRE, DEFENDANT CRIST, DEFENDANT MAZZA,
DEFENDANT JARRELL, AND DEFENDANT LAASRI.**

102. Plaintiff hereby incorporates paragraphs 1 through 101 as though fully set forth herein.

103. Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri took retaliatory actions in violation of the Missouri Human Rights Act, Mo. Rev. Stat. § 213.070(2).

92. Plaintiff's act of engaging in a protected activity by requesting time off to act as caretaker for her ill mother under the FMLA was a contributing factor in Defendants' decision to retaliate against Plaintiff by terminating her.

93. Furthermore, Defendants took further retaliatory actions against Plaintiff by interfering with her right to unemployment benefits. Plaintiff is currently fighting in the Missouri Division of Employment Security for her legal Unemployment Compensation rights, as an employee of Marriott Grand Hotel for over 8 years.

94. Defendants' actions were unreasonable and disrupted Mitchell well-being.

95. As a result of Defendants' actions, Mitchell now has no financial support to care for her ill mother and daughter.

96. Defendants engaged in actions that created an atmosphere where Mitchell was subject to open discrimination.

97. Defendants knew that these actions were unlawful.

98. Defendants' acts were undertaken maliciously and/or in reckless disregard of Plaintiff's right to be free from discrimination in the workplace.

99. Plaintiff has been damaged by Defendants' unlawful actions.

WHEREFORE, Plaintiff Danielle Mitchell prays that this honorable Court enter judgment in her favor and against Defendant Marriott Grand Hotel, Defendant Shell, Defendant Sostre, Defendant Crist, Defendant Mazza, Defendant Jarrell, and Defendant Laasri for a fair and reasonable amount in excess of twenty-five thousand (\$25,000.00) dollars including the following:

- a. Declare the conduct engaged in by Defendants to be a violation of Plaintiff's rights;
- b. Actual damages including future-pay, front-pay, equitable relief, compensatory damages, including an amount equal to his lost wages and other benefits of employment, with interest;
- c. Award Plaintiff reasonable attorney's fees and costs incurred herein;
- d. Award Plaintiff compensatory and punitive damages;
- e. Award Plaintiff for emotional pain and suffering; and
- f. Grant such other and further legal relief as the Court deems just and proper under the facts and circumstances.

DEMAND FOR A JURY TRIAL

Plaintiff demands trial by jury on all issues triable by a jury in this complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charlie Dickman", written over a horizontal line.

Charlie Dickman MO #50993
KANSAS CITY ROAD LAWYERS, LLC
600 Broadway, Suite 490
Kansas City, Missouri 64105
Telephone: (816) 505-1906
Facsimile: (888) 474-6649
E-Mail: charlie@kcroadlawyers.com
ATTORNEY FOR PLAINTIFF

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

DANIELLE MITCHELL

Plaintiff/Petitioner

APRIL 26, 2017

Date

vs.

MARRIOTT INTERNATIONAL INC, ET AL

Defendant/Respondent

Case number

Division

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now DANIELLE MITCHELL, Requesting Party, pursuant

to Local Rule 14, requests the appointment by the Circuit Clerk of

Name of Process Server	Address	Telephone
John Hefe	P.O. Box 31321 St. Louis, MO 63131	314-966-2850
Robyn Hendricks	P.O. Box 31321 St. Louis, MO 63131	314-966-2850
Mike Ehnes	P.O. Box 31321 St. Louis, MO 63131	314-966-2850

to serve the summons and petition in this cause on the below named parties.

SERVE:
 MARRIOTT INTERNATIONAL INC

Name
 12747 Olive Boulevard #300

Address
 St. Louis, Missouri 63141

City/State/Zip
 Registered Agent
 Corporate Creations Network

SERVE:
 VERA SOSTRE

Name
 616 N 7th Street, Apartment 909

Address
 St. Louis, Missouri 63101

City/State/Zip

Appointed as requested:
 TOM KLOEPPINGER, Circuit Clerk

By
 Deputy Clerk

Date

SERVE:
 DENISE SHELL

Name
 1672 B Northwinds Estate Drive

Address
 St. Louis, Missouri 63136

City/State/Zip

SERVE:
 REBECCA CRIST

Name
 800 Washington Avenue

Address
 St. Louis, Missouri 63101

City/State/Zip

/s/ Charles Dickman

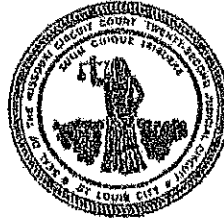
Attorney/Plaintiff/Petitioner
 50993

Bar No.
 600 Broadway, Ste 490, Kansas City, MO

Address
 816-505-1906

Phone No.

In the
CIRCUIT COURT
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to serve the summons and petition in this cause on the below named parties.

SERVE:
 MELISSA MAZZA

Name
 800 Washington Avenue
 Address
 St. Louis, Missouri 63101
 City/State/Zip

SERVE:
 NOUREDDINE LAASRI

Name
 9364 Pine Avenue
 Address
 St. Louis, Missouri 63144
 City/State/Zip

Appointed as requested:
TOM KLOEPPINGER, Circuit Clerk

By
 Deputy Clerk

Date

SERVE:
 DEVON JARRELL

Name
 4101 Arsenal Street, 1F
 Address
 St. Louis, Missouri 63116
 City/State/Zip

SERVE:

Name
 Address
 City/State/Zip

/s/ Charles Dickman
 Attorney/Plaintiff/Petitioner
 50993

Bar No.
 600 Broadway, Ste 490, Kansas City, MO

Address
 816-505-1906

Phone No.

1722-CC01155

In the
CIRCUIT COURT
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DANIELLE MITCHELL

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Name of Process Server

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to serve the summons and petition in this cause on the below named parties.

SERVE:

MARRIOTT INTERNATIONAL INC

Name

12747 Olive Boulevard #300

Address

St. Louis, Missouri 63141

City/State/Zip

Registered Agent

Corporate Creations Network

SERVE:

VERA SOSTRE

Name

616 N 7th Street, Apartment 909

Address

St. Louis, Missouri 63101

City/State/Zip

SERVE:

DENISE SHELL

Name

1672 B Northwinds Estate Drive

Address

St. Louis, Missouri 63136

City/State/Zip

SERVE:

REBECCA CRIST

Name

800 Washington Avenue

Address

St. Louis, Missouri 63101

City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By: *Michelle McHadden*
 Deputy Clerk
 Date: *April 26, 2017*

/s/ Charles Dickman

Attorney/Plaintiff/Petitioner
 50993Bar No.
 600 Broadway, Ste 490, Kansas City, MOAddress
 816-505-1906

Phone No.

In the
CIRCUIT COURT
 City of St. Louis, Missouri



For File Stamp Only

DANIELLE MITCHELL

Plaintiff/Petitioner

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to serve the summons and petition in this cause on the below named parties.

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 MELISSA MAZZA

Name
 800 Washington Avenue
 Address
 St. Louis, Missouri 63101
 City/State/Zip

SERVE:
 NOUREDDINE LAASRI

Name
 9364 Pine Avenue
 Address
 St. Louis, Missouri 63144
 City/State/Zip

SERVE:
 DEVON JARRELL

Name
 4101 Arsenal Street, 1F
 Address
 St. Louis, Missouri 63116
 City/State/Zip

SERVE:

Name
 Address
 City/State/Zip

Appointed as requested:

TOM KLOEPPINGER, Circuit Clerk

By Michelle McMullan
 Deputy Clerk
 Date April 26/2017

/s/ Charles Dickman

Attorney/Plaintiff/Petitioner
 50993

Bar No.
 600 Broadway, Ste 490, Kansas City, MO

Address
 816-505-1906


Phone No.



IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employmnt Discrimtn 213.111		

Summons in Civil Case

The State of Missouri to: MARRIOTT INTERNATIONAL INC Alias: DBA ST LOUIS MARRIOTT GRAND HOTEL CORPORATE CREATIONS NETWORK INC 12747 OLIVE BOULEVARD 300 SAINT LOUIS, MO 63141		<div style="border: 1px solid black; padding: 5px; text-align: center;"> SPECIAL PROCESS SERVER </div>														
 <p>CITY OF ST LOUIS</p>	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <p style="text-align: right;"><i>Thomas Hoepfinger</i> Clerk</p>															
<p style="text-align: center;">Further Information: _____</p>																
<p style="text-align: center;">Sheriff's or Server's Return</p> <p>Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other _____</p> <p>Served at _____ (address)</p> <p>in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).</p> <p>_____ Printed Name of Sheriff or Server</p> <p>_____ Signature of Sheriff or Server</p> <p>Must be sworn before a notary public if not served by an authorized officer:</p> <p>(Seal) Subscribed and sworn to before me on _____ (date).</p> <p>My commission expires: _____ Date _____ Notary Public</p>																
<table border="0"> <tr> <td>Sheriff's Fees</td> <td></td> </tr> <tr> <td>Summons</td> <td>\$ _____</td> </tr> <tr> <td>Non Est</td> <td>\$ _____</td> </tr> <tr> <td>Sheriff's Deputy Salary</td> <td></td> </tr> <tr> <td>Supplemental Surcharge</td> <td>\$ 10.00</td> </tr> <tr> <td>Mileage</td> <td>\$ _____ (_____ miles @ \$ _____ per mile)</td> </tr> <tr> <td>Total</td> <td>\$ _____</td> </tr> </table> <p>A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.</p>			Sheriff's Fees		Summons	\$ _____	Non Est	\$ _____	Sheriff's Deputy Salary		Supplemental Surcharge	\$ 10.00	Mileage	\$ _____ (_____ miles @ \$ _____ per mile)	Total	\$ _____
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IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employmnt Discrimtn 213.111		

Summons in Civil Case


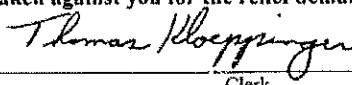
The State of Missouri to: DENISE SHELL Alias: 1672 B. NORTHWINDS ESTATE DR ST. LOUIS, MO 63136		<div style="border: 1px solid black; padding: 5px; text-align: center;"> SPECIAL PROCESS SERVER </div>														
<div style="display: flex; align-items: center;"> <div> <p>COURT SEAL OF</p> <p>CITY OF ST LOUIS</p> </div> </div> <p style="text-align: center;">You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <div style="display: flex; justify-content: space-between;"> <div> <p>_____</p> <p>Date</p> </div> <div> <p><i>Thomas Hoepfinger</i></p> <p>_____</p> <p>Clerk</p> </div> </div> <p>Further Information: _____</p>																
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IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employmnt Discrmntn 213.111		

Summons in Civil Case

The State of Missouri to: VERA SOSTRE Alias: 616 N 7TH ST APT 909 ST. LOUIS, MO 63101		<div style="border: 1px solid black; padding: 5px; text-align: center;"> SPECIAL PROCESS SERVER </div>														
<div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">  COURT SEAL OF CITY OF ST LOUIS </div> <div> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <p style="text-align: center;">Date</p> </div> <div style="text-align: center;">  Clerk </div> </div>																
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Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employmnt Discrimtn 213.111		

Summons in Civil Case

The State of Missouri to: REBECCA CRIST Alias: 800 WASHINGTON AVENUE ST. LOUIS, MO 63101		<div style="border: 1px solid black; padding: 5px; text-align: center;"> SPECIAL PROCESS SERVER </div>														
<div style="display: flex; align-items: center;"> <div> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <p style="text-align: center;">Date</p> <p style="text-align: center;">Further Information:</p> </div> <div style="margin-left: 20px;"> <p><i>Thomas Hoepfinger</i></p> <p style="text-align: center;">Clerk</p> </div> </div>																
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IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employment Discrimination 213.111		

Summons in Civil Case


The State of Missouri to: MELISS MAZZA Alias: 800 WASHINGTON AVENUE ST. LOUIS, MO 63101		<div style="border: 1px solid black; padding: 5px; text-align: center;"> SPECIAL PROCESS SERVER </div>														
<div style="display: flex; align-items: center;"> <div> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <p style="text-align: right;"> Clerk </p> </div> </div>																
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IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employment Discrimination 213.111		

Summons in Civil Case

The State of Missouri to: DEVON JARRELL Alias: 4104 ARSENAL STREET, 1F ST. LOUIS, MO 63116		SPECIAL PROCESS SERVER
 <p>CITY OF ST LOUIS</p>		
<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p>April 26, 2017</p> <p>_____ Date</p> <p><i>Thomas Hoepfinger</i> _____ Clerk</p>		
Further Information:		

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____


A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT COURT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL KELLAN MULLEN	Case Number: 1722-CC01155	JOHN HEFELE ROBYN HENDRICKS MIKE EHNES
Plaintiff/Petitioner: DANIELLE MITCHELL	Plaintiff's/Petitioner's Attorney/Address CHARLES RICHARD DICKMAN KC ROAD LAWYERS LLC 600 BROADWAY BLVD SUITE 490 KANSAS CITY, MO 64105	
Defendant/Respondent: MARRIOTT INTERNATIONAL INC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
Nature of Suit: CC Employmnt Discrmntn 213.111		

Summons in Civil Case

The State of Missouri to: NOUREDDINE LAASRI Alias: 9364 PINE AVENUE ST. LOUIS, MO 63144		SPECIAL PROCESS SERVER
 <p style="text-align: center;">CITY OF ST LOUIS</p>		
<p style="text-align: center;">You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">April 26, 2017</p> <p style="text-align: center;">Date Clerk</p> <p style="text-align: right;"><i>Thomas Koeppinger</i></p>		
Further Information:		

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

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(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on (date).

My commission expires:

Date

Notary Public

Sheriff's Fees

Summons	\$	
Non Est	\$	
Sheriff's Deputy Salary		
Supplemental Surcharge	\$	10.00
Mileage	\$	(miles @ \$ per mile)
Total	\$	

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.